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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of)
)
Amendment of Parts 2 and 97 of the) RM-9949
Commission's Rules Concerning the use)
of the 2400- 2402 MHz Band by the)
Amateur and Amateur-Satellite Services)

To: The Commission

Comments in Support of Subject Rule Making

Background

On July 17, 2000, the American Radio Relay League (ARRL) submitted a petition to the Commission requesting amendment of Section 2.106 of the Commission's Rules (47 C.F.R. 2.106), The United States Table of Frequency Allocations, and amendment of Section 97.303 (j)((2) of the Amateur Service Rules, 47 C.F.R. 97.303(j)(2) to change the domestic allocation status for the Amateur Service and the Amateur-Satellite Service of the 2400-2402 MHz segment from secondary to primary.

The Radio Amateur Satellite Corporation (AMSAT) is a non-profit scientific and educational organization, chartered in the District of Columbia in 1969 to construct, test and obtains launches for satellites for use by the world's licensed radio amateurs. AMSAT commends ARRL for taking this action, and wishes to express wholehearted support of it.

Discussion

In its filing, ARRL very adequately addressed the background of the 2400-2402 MHz segment and, AMSAT believes, made an excellent case for elevating its status for the Amateur Service and the Amateur-Satellite Service. AMSAT is in agreement with everything ARRL said in that regard and with ARRL's contention that elevating the Amateur Service and Amateur-Satellite allocation status in this band segment from secondary to primary is vital to future use of

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this important portion of the radio spectrum for amateur satellites.

ARRL also did a fine job of highlighting the use of the 2400-2402 MHz segment by present and past amateur radio satellites and stressing the future importance of the segment on amateur radio satellites. AMSAT wishes to echo what ARRL has said, and add details regarding the Phase 3D satellite due for launch on an Ariane 5 launch vehicle by late October or early November of this year.

This spacecraft was built mostly by volunteers from a number of countries at a cost of approximately FOUR MILLION DOLLARS. It carries a group of broadband receivers in various bands available to the Amateur-Satellite Service from 21 MHz to 5.7 GHz and broadband linear transmitters in the various Amateur-Satellite Service bands from 144 MHz to 24 GHz. These receivers and transmitters are connected through an IF matrix such that, except for in-band, any combination of receivers can be connected to any group of transmitters. Two of Phase 3D's transmitters are in the 2400-2402 MHz segment, as is one of its receivers. It is expected that these particular transmitters and receivers will come into a great deal of use, once the satellite becomes operational.

Recommendations

The Radio Amateur Satellite Corporation urges the Commission to take favorable action on the subject Rule Making at the earliest possible date.

Respectfully submitted,

Keith Baker KB1SF Date: 25 SEP 00
President

cc
American Radio Relay League